

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

IN RE WILLIS TOWERS WATSON PLC  
PROXY LITIGATION

Civ. A. No. 1:17:cv-01338-AJT-JFA

CLASS ACTION

**LEAD COUNSEL’S MOTION FOR  
ATTORNEY’S FEES AND LITIGATION EXPENSES**

Pursuant to this Court’s Order Preliminarily Approving Settlement and Authorizing Dissemination of Notice of Settlement dated January 21, 2020 (ECF No. 333), Lead Counsel moves this Court, under Rule 23(e) and 23(h) of the Federal Rules of Civil Procedure, for entry of an Order awarding attorneys’ fees and litigation expenses.<sup>1</sup> This motion is based on (a) the Declaration of Salvatore J. Graziano in Support of (I) Lead Plaintiff’s Motion for Final Approval of Settlement and Plan of Allocation, and (II) Lead Counsel’s Motion for Attorneys’ Fees and Litigation Expenses; (b) the Memorandum of Law in Support of Lead Counsel’s Motion for Attorneys’ Fees and Litigation Expenses; and (c) all other papers and proceedings herein. A proposed Order granting the requested relief will be submitted with Lead Plaintiff’s reply papers after the deadlines for objecting to the motion has passed.

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<sup>1</sup> All capitalized terms used herein that are not otherwise defined herein have the meanings provided in the Stipulation and Agreement of Settlement dated January 15, 2021 (ECF No. 330-1).

Dated: March 31, 2021

Respectfully submitted,

/s/ Susan R. Podolsky

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University of California, and Class Counsel for  
the Class*

#3014312

**CERTIFICATE OF SERVICE**

I hereby certify that on the 31st day of March 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record.

/s/ Susan R. Podolsky  
Susan R. Podolsky (Va. Bar No. 27891)